



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

*Transmitted via Electronic Mail*

Ms. Kyla L. Townsend-McIntyre  
U.S. Environmental Protection Agency, Region III  
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA  
Constitution High School ULCS #2670

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Constitution High School.

This Disclosure Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – Constitution High School ULCS #2670* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

A handwritten signature in cursive script that reads "Francine Locke".

Francine Locke, MS  
Director, Environmental Management & Services

Attachment 1 – CAP – Constitution High School ULCS #2670

SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: May 15, 2008

Facility Name: Constitution High School #2670  
Facility Address: 18 S. 7th Street, Philadelphia, PA 19106  
Date of Audit: 04/04/08  
Date CAP due to EPA: 6/3/08

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status(include date when closed)	Preventative Measure	Preventative Measures Status (include date when closed)	Extension Filed (Y/N)	Exhibit Reference	Approximate Cost to Close Finding	Potential Reduction of Pollutants *INCLUDE AMT OF OIL
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E										
1	(40 CFR § 763.93(a)(2))	An initial management plan in dated January 2007. This location initally opened as a school in September 2007. For buildings obtained after October 12, 1988 the LEA must submit the plan to the DEP Bureau of Air Quality	Submit a copy of the latest Reinspection Report to the DEP Bureau of Air Quality.	Closed 5/9/08 - A copy of the latest reinspection report was submitted to the following: Commonwealth of Pennsylvania DEP Bureau of Air Quality Attn: Randy Koppenhaver 400 Market Street P.O. Box 8468 Harrisburg, PA 17101-8468	Maintain accurate up-to-date information regarding buildings that are planned for lease or purchase. Ensure that the DEP Bureau of Air Quality receives a copy of the management plan for all new locations.	In Progress	N	1	\$400	Recordkeeping violation
2	(40 CFR § 763.85(b)(1)(vii) )	The regulations require that the 3 Year Reinspections records be updated within 30 days of the inspection. The most recent Reinspection Report is dated January 2007 and was available for review at the central file and the school building, however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in January 2007.	The 3 Year Reinspection records must be updated within 30 days of the actual inspection. This is a historical finding.	Historical finding. Corrective Action can not be completed.	Implement and track the Reinspection date in a compliance calendar so that the 30 day update can be tracked by both the school and personnel in the central office for the next 3 Year Reinspection in 2009.	A compliance calendar should be established and implemented so that the 30 day update can be tracked by the personnel in the central office for the next 3 Year Reinspection in 2009.	N	2	N/A	Recordkeeping violation

**School District of Philadelphia**  
**Asbestos Hazard Emergency Response Act (AHERA)**  
**Compliance Audit**

**Principal Interview Form**


The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

<b>School/ Facility:</b>	Constitution High School #2670
<b>Address:</b>	18 S. 7 <sup>th</sup> Street
<b>Date of Audit:</b>	4/4/08

**School Principal:**

Print Name: THOMAS R DIAVINSON

Sign Name: 

Date: 4/4/08

7003 2260 0006 5339 8516

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*5/9/08*  
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Sent To *Randy Koppenhaver DEP Bureau of*  
 Street, Apt. No., or PO Box No. *PO Box 8468*  
 City, State ZIP+4 *Harrisburg PA 17101-8468*

PS Form 3800, June 2002

See Reverse for Instructions

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- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Attn: Randy Koppenhaver  
DEP Bureau of Air Quality  
400 Market St  
P.O. Box 8468  
Harrisburg, PA 17101-8468

## 2. Article Number

(Transfer from service label)

7003 2260 0006 5339 8516

**COMPLETE THIS SECTION ON DELIVERY**

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X

☐ Agent☐ Addressee

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Date of Delivery

MAR 13 2008

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Constitution High

## 3. Service Type

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## 4. Restricted Delivery? (Extra Fee)

☐ Yes



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

May 7, 2008

Attn: Randy Koppenhaver  
DEP Bureau of Air Quality  
400 Market Street P.O. Box 8468  
Harrisburg, PA 17101-8468

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental  
Compliance

Mr. Koppenhaver

I am submitting herewith the asbestos management plan for the School District of Philadelphia as required by the terms of the Asbestos Hazard Emergency Response Act of 1986. This plan was developed with the assistance of Synertech Incorporated and Batta Environmental Incorporated. The inspection was conducted by Synertech Incorporated.

The Asbestos Coordinator for the School District of Philadelphia is

Mr. Jerry Junod  
440 North Broad Street, Room 3053  
Philadelphia, PA 19130  
215-400-6738

All records pertaining to the School District's AHERA Compliance Program are maintained at the above designated location.

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

A handwritten signature in cursive script, appearing to read "Francine Locke".

Francine Locke, MS  
Director, Environmental Management & Services

# SCHOOL DISTRICT OF PHILADELPHIA

## AHERA

### THREE YEAR REINSPECTION VI

Constitution High School

ULCS# 2670

7<sup>TH</sup> and Market Streets  
Philadelphia, Pennsylvania

January, 2007

*Conducted By:*

Batta Environmental Associates, Incorporated  
Environmental Testing Consultants, LLC  
G & C Environmental Services, Incorporated  
Kleinfelder East, Incorporated  
Synertech Incorporated  
USA Environmental Management, Incorporated

*Prepared By:*

School District of Philadelphia  
Batta Environmental Associates, Incorporated  
Synertech Incorporated

**SCHOOL DISTRICT OF PHILADELPHIA**  
**EDUCATION CENTER**  
440 NORTH BROAD STREET, 3<sup>RD</sup> FLOOR  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT & SERVICES

PHONE - (215) 400-4750

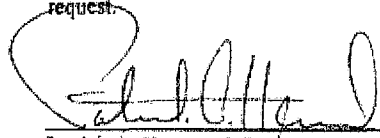
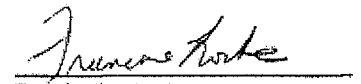
January, 2008

TO: All Principals  
All Building Engineers

FROM: Francine Locke, Manager  
Environmental Management & Services

SUBJECT: AHERA Reinspection Report

In order to comply with the provisions of the Asbestos Hazard Emergency Response Act (AHERA), the attached report is submitted to you. The law requires that this report be kept in the offices of the principal and the building engineer. It cannot be removed from these locations. All asbestos reports must be available to the public upon request.

  
Patrick A. Henwood, Director  
Office of Capital Programs  
Francine Locke, Manager  
Office of Environmental Management  
and Services



## **AHERA THREE YEAR REINSPECTION VI TABLE OF CONTENTS**

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- C. Original Management Plan Information
- D. Post-Management Plan Activities and Changes
- E. Three Year Reinspection Overview
- F. Response Actions and Prioritization

### **Section II**

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- A. Introduction
- B. Building Inspector's Accreditation Statement
- C. Reinspection Form Key
- D. Reinspection Forms
  - 1. Homogeneous Area Reports
  - 2. Specific Location Logs

## **Executive Summary**

The AHERA Three Year Reinspection VI of the Constitution High School, has been completed and the report of the reinspection submitted to the School District of Philadelphia. The reinspection was conducted as a joint project of Batta Environmental Associates, Incorporated, Environmental Testing Consultants, LLC, G & C Environmental Services, Incorporated, Kleinfelder East, Incorporated, Synertech Incorporated and USA Environmental Management, Incorporated. This reinspection was conducted on January 29, 2007 by Melissa Kendzior, Building Inspector of Environmental Testing Consultants, LLC.

The information contained in the report of the reinspection was obtained from the original Asbestos Management Plan for the school, from update reports on changes and activities since the completion of the Management Plan and from the Three Year Reinspection of the school. This reinspection report was prepared by Jeffrey M. Kuntz, Management Planner of Batta Environmental Associates, Incorporated.

The following Asbestos Containing Building Materials (ACBMs), which were identified in the original Management Plan or in the 1992, 1995, 1998, 2001 or 2004 AHERA Three Year Reinspection reports, were inspected for this project:

- **No Applicable Material**

The following Asbestos Containing Building Materials (ACBMs), were identified during this AHERA Three Year Reinspection and were not included in the original Management Plan of 1988 or 1989 or in the subsequent three year reinspection reports:

- **Floor Tile VAT 12" x 12"** located in the Basement and on the First, Second, Third, Fourth and Fifth Floors, was identified and ASSUMED to contain asbestos. Damage to this material was noted in the Basement. No damage to this material was noted on the First, Second, Third, Fourth or Fifth Floors. \*\*\* (Note: All Floor Tile must be bulk sampled before any renovation work is performed, unless previously sampled).

## **Section I      Report of Reinspection**

- A. Introduction
- B. Management Planner's Accreditation Statement
- C. Original Management Plan Information
- D. Post-Management Plan Activities and Changes
- E. Three Year Reinspection Overview
- F. Response Action Prioritization

## Section I - A

### Report of Reinspection

#### Introduction

The Three Year Reinspection VI was performed to fulfill the requirements of 40 CFR Part 763 - the Asbestos Hazard Emergency Response Act (AHERA). As required by AHERA, each Local Education Agency (LEA) must reinspect all known confirmed or assumed Asbestos Containing Building Material (ACBM) located in the LEA's facilities. This reinspection is intended to update the original Asbestos Management Plan for the LEA's facilities.

The reinspection of the Constitution High School, was performed on January 29, 2007 by Melissa Kendzior, Building Inspector of Environmental Testing Consultants, LLC. The report of the reinspection was prepared by Jeffrey M. Kuntz, Management Planner of Batta Environmental Associates, Incorporated.

Accreditation information for the Management Planner is located in *Section I.B.* of this report. Accreditation information for the Building Inspector is located in *Section II.A.* of this report.

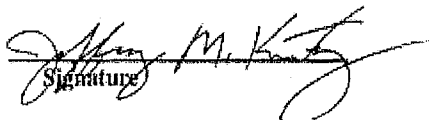
During the reinspection of each School District of Philadelphia facility, the Management Plan for that facility was reviewed. Information from the conclusions section of that report is included in *Section I.C.* of this report. Additionally, information on activities such as abatements, cleanings, sampling and inspections, which have taken place since the completion of the original Management Plan, was reviewed during the reinspection. Information on those activities is included in *Section I.D.* of this report.

**Section I - B**

**MANAGEMENT PLANNER  
ACCREDITATION STATEMENT**

The under-signed Management Planner has reviewed the reinspection data, developed prioritized response actions, and made recommendations for the subject school/facility addressed in this AHERA Three Year Reinspection Report. The scope of this report is based upon the information contained in the Asbestos Hazard Emergency Response Act of 1986, and other Federal regulations and EPA publications. EPA personnel reviewed the report format prior to its finalization.

<b>Management Planner:</b>	Jeffrey M. Kuntz
<b>Employer:</b>	Batta Environmental Associates, Inc.
<b>Telephone Number:</b>	(302) 737-3376
<b>Accreditation Agency:</b>	Central Delaware Training Academy, Inc.
<b>Accreditation Number:</b>	025952

  
Signature

CENTRAL DELAWARE TRAINING ACADEMY, INC.

JEFFREY M. KUNTZ

has successfully completed EPA APPROVED

AHERA MANAGEMENT PLANNER REFRESHER TRAINING

COURSE LENGTH 4 HOURS

April 17<sup>th</sup>, two thousand-seven

CDTA  
P.O. BOX 1344  
DOVER, DE 19903-1344  
(302) 677-1534

  
DAVID T. STANLEY, PRESIDENT

  
RONALD S. HERCHA, VICE PRESIDENT

EXAM DATE: 041707

EXPIRE DATE: 041708

ID NUMBER CMP070417-0049

## **Section I - C**

### **Original Management Plan Information**

- **Not Available**

## **Section I - D**

### **Post Management Plan Activities/Changes**

Information on activities affecting Asbestos Containing Building Materials (ACBMs) at the Constitution High School, is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Updates to the Management Plan include the following:

#### **PERIODIC (SIX MONTH) SURVEILLANCE**

##### **Month/Year**

June, 2006

On June 29, 2006, a Six Month Surveillance of ACM was conducted at the Franklin Institute Science and Leadership Academy. The following areas were reported to contain damaged ACM:

##### **LOCATION**

##### **TYPE OF MATERIAL**

\*\*Note: Building undergoing major interior renovation at time of visit.

#### **OPERATIONS AND MAINTENANCE**

##### **Month/Year**

No Applicable data

#### **ABATEMENT**

##### **Month/Year**

No Applicable Data

#### **SAMPLING AND ANALYSIS**

##### **Month/Year**

No Applicable Data



## **Section I - E**

### **Three Year Reinspection VI Overview**

Each homogeneous area of Asbestos Containing Building Material (ACBM) listed in the original Management Plan and in the 1992, 1995, 1998, 2001 or 2004 Three Year Reinspection reports were inspected for the AHERA Three Year Reinspection VI, and the information for that material verified. Any changes to a homogeneous area listed in the updates to the Management Plans were verified. Any area of suspected ACBM found in the course of the reinspection, and not listed in the Management Plan or updates, were either assumed to contain asbestos or sampled and analyzed to determine their asbestos content. Any such new areas either assumed to contain asbestos or determined through analysis to contain asbestos were included in the report of the Three Year Reinspection. The results of the AHERA Three Year Reinspection VI are tabulated in the homogeneous area reports located in *Section II* of this report.

## Section I - F

### Response Action Prioritization

The AHERA Three Year Reinspection VI included the determination of response actions for the Asbestos Containing Building Materials (ACBMs) observed at the subject school/facility. The ACBMs were also given prioritization rankings.

The **Response Action (RA)** rating is based on the AHERA regulations, and is comparable to the RA rating found in the "Original Inspection Data" section. The following table details the response actions:

1. Establish O&M Program
  2. Repair and Establish O&M Program
  3. Enclose
  4. Encapsulate
  5. Remove
  6. Partial Removal and Establish O&M Program
- 
- a. **High Priority Response**  
The homogeneous area has been scheduled for abatement or other response action.
  - b. **Medium Priority Response**  
The homogeneous area will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.
  - c. **Low Priority Response**  
The homogeneous area will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.
  - d. **On-Going Response/Operations and Maintenance**  
The homogeneous area does not require abatement at present, and should be included in the facility's on-going operations and maintenance program.

The response actions and prioritization rankings for the subject school/facility, as determined in the Three Year AHERA Reinspection VI, are as follows:

**Priority****Homogeneous Area/Response Action****Low Priority Response**

**HA#** 2650/01/0B/FF  
**Material:** Floor Tile VAT 12" x 12"  
**Location:** Basement  
**RA#** 6/C

**On-Going Response/  
Operations and Maintenance**

**HA#** 2650/01/01/AA  
**Material:** Floor Tile VAT 12" x 12"  
**Location:** First Floor  
**RA#** 1/D

**HA#** 2650/01/02/BB  
**Material:** Floor Tile VAT 12" x 12"  
**Location:** Second Floor  
**RA#** 1/D

**HA#** 2650/01/03/CC  
**Material:** Floor Tile VAT 12" x 12"  
**Location:** Third Floor  
**RA#** 1/D

**HA#** 2650/01/04/DD

**Material:** Floor Tile VAT 12" x 12"

**Location:** Fourth Floor

**RA#** 1/D

**HA#** 2650/01/05/EE

**Material:** Floor Tile VAT 12" x 12"

**Location:** Fifth Floor

**RA#** 1/D

## **Section II      Reinspection Data**

- A. Introduction
- B. Building Inspector's Accreditation Statement
- C. Reinspection Form Key
- D. Reinspection Forms
  - 1. Homogeneous Area Information Report
  - 2. Specific Location Logs

## **Section II - A**

### **Reinspection Data**

#### **Introduction**

The following information documents the Three Year Reinspection VI of the subject school/facility. The homogeneous area reports were produced using the building inspector's field data on the facility. Key to the homogeneous area report is located immediately prior to that portion of the report.

Section II - B

**BUILDING INSPECTOR  
ACCREDITATION STATEMENT**

The undersigned building inspector has applied the scope and procedures of the AHERA Three Year Reinspection to the subject school/facility addressed in this report. The inspection techniques utilized for this inspection are based on those recommended in EPA guidelines.

<b>Building Inspector:</b>	Melissa M. Kendzior
<b>Employer:</b>	Environmental Testing Consultants, LLC
<b>Telephone Number:</b>	(856) 482-1311
<b>Accreditation Agency:</b>	Access Training Services, Inc.
<b>Accreditation Number:</b>	032234

  
Signature

# Certificate of Completion

**Melissa Kendzior**

*for successfully completing the prescribed course of study in*

## **EPA/AHERA/Pennsylvania Asbestos Building Inspector Refresher Course**

**under TSCA Title II**

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
706 West Maple Avenue, Merchantville, NJ 08109  
(856) 665-3449

3/16/06

*Course Date*

N/A

*Exam Date*

3/16/07

*Expiration Date*

Not Provided

*Social Security Number*

ACC-0306-6-043

*Certificate Number*



**Mark K. Schlager**  
*Training Director*



**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>ULCS#</b>	Individual identification number assigned to each school within the School District of Philadelphia.
<b>HOMOGENEOUS AREA ID#</b>	Identification number assigned to each homogeneous area in a school/facility. Each section of the homogeneous area ID is significant.  1010/01/01/01 A B C D  A. Is the ULCS# for the school. B. Designates the specific building/building area within the school. C. Designates the floor or level within the building/building area. D. Designates the homogeneous material within that floor or level. Note: Item D may be a number or a letter.
<b>SYSTEM AFFECTED</b>	Corresponds to the AHERA system for classifying materials.  T : Thermal System S : Surfacing System M : Miscellaneous
<b>ITEM AFFECTED</b>	Is a description of the homogeneous material.
<b>ORIGINAL INSPECTION DATA</b>	This section contains the information found in the original Management Plan (1988-1989).
<b>AMOUNT OF MATERIAL/ UNIT</b>	Quantity of material, and measuring unit. Units include: Square Feet (SF) Each (EA) Linear Feet (LF) Cubic Feet (CF).

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

**ITEM**

**DEFINITION**

**CND  
Condition**

Corresponds to AHERA condition rating for materials.

- |          |          |                    |
|----------|----------|--------------------|
| <b>0</b> | <b>:</b> | No Damage          |
| <b>1</b> | <b>:</b> | Damage             |
| <b>2</b> | <b>:</b> | Significant Damage |

**DP  
Damage Potential**

Corresponds to the AHERA material assessment system.

- |          |          |                                  |
|----------|----------|----------------------------------|
| <b>1</b> | <b>:</b> | Potential for Damage             |
| <b>2</b> | <b>:</b> | Potential for Significant Damage |

**ASMD  
Assumed  
Asbestos**

This means that a material was not sampled for asbestos content during the original Management Plan inspection.

**RA  
Response  
Action**

This corresponds to the AHERA system of response action rating for materials.

- |          |          |   |
|----------|----------|---|
| <b>1</b> | <b>:</b> | Establish O&M Program                     |
| <b>2</b> | <b>:</b> | Repair and Establish O&M Program          |
| <b>3</b> | <b>:</b> | Enclose                                   |
| <b>4</b> | <b>:</b> | Encapsulate                               |
| <b>5</b> | <b>:</b> | Remove                                    |
| <b>6</b> | <b>:</b> | Partial Removal and Establish O&M Program |

**CHANGES**

This section describes changes to the homogeneous material in the eighteen years since the original AHERA inspection. The abbreviations are defined below.

- |              |          |              |
|--------------|----------|--------------|
| <b>RMVD</b>  | <b>:</b> | Removed      |
| <b>ENCL</b>  | <b>:</b> | Enclosed     |
| <b>ENCP</b>  | <b>:</b> | Encapsulated |
| <b>DMGD</b>  | <b>:</b> | Damaged      |
| <b>SMPLD</b> | <b>:</b> | Sampled      |
| <b>MTRL</b>  | <b>:</b> | Material     |
| <b>RPRD</b>  | <b>:</b> | Repaired     |
| <b>N/L</b>   | <b>:</b> | None Located |
| <b>RPLCD</b> | <b>:</b> | Replaced     |

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>THREE YEAR REINSPECTION DATA</b>	This section contains the information obtained from the Three Year Reinspection VI. With three exceptions, the information categories are identical in format and meaning to those found in the original inspection data section. The three exceptions are defined below.
<b>DMGD AMT Amount Damaged</b>	This section gives the quantity of damaged material in a homogeneous area. The quantity is shown in the same format as the amount of material/unit section.
<b>NF Newly Friable</b>	This section identifies materials in the original Management Plan which have since become friable.
<b>RA Response Action</b>	<p>This rating is based on the AHERA regulations, and is comparable to the RA rating found in the "Original Inspection Data" section. The following table details the response actions.</p> <ol style="list-style-type: none"><li>1. Establish O&amp;M Program</li><li>2. Repair and Establish O&amp;M Program</li><li>3. Enclose</li><li>4. Encapsulate</li><li>5. Remove</li><li>6. Partial Removal and Establish O&amp;M Program</li></ol> <ol style="list-style-type: none"><li>a. <b>High Priority Response</b> The homogeneous material has been scheduled for abatement or other response action.</li><li>b. <b>Medium Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.</li><li>c. <b>Low Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.</li></ol>

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
	<p><b>d. On-Going Response/Operations and Maintenance</b> The homogeneous material does not require abatement or other response action at present, and should be included in the facility's on-going operations and maintenance program.</p> <p>The information presented in the changes section has been compiled from a variety of sources, including the Reinspection and the following:</p> <ul style="list-style-type: none"><li>* Quality Control/Quality Assurance Reports of asbestos abatement projects, prepared by consultants to the School District.</li><li>* Permit and Notification Forms for asbestos abatement projects.</li><li>* Periodic Surveillance Forms</li><li>* Operations and Maintenance activities performed by School District personnel.</li><li>* Verbal information from School District personnel.</li><li>* Reports of sampling and analysis of suspected materials by both School District personnel and outside consultants.</li></ul>
<b>SPECIFIC LOCATION LOG</b>	<p>This section gives information, including damage amount and location, for a specific homogeneous material on a room by room basis and follows the reinspection form.</p>

*NOTE:* The disparate nature of the above sources of information prohibits the verification of much information within the scope of the AHERA Three Year Reinspections. Discrepancies and omissions may exist in this information, and therefore is included on an "as is" basis. The inspectors for the Three Year Reinspection VI evaluated homogeneous areas based on the materials current condition and location, as evidenced during the inspector's site visit.

## Homogenous Area Information Report By ULCS Location Three Year Reinspection

Building Inspector: Melissa Kendzior  
Number: 032234

Management Planner: Jeffrey M. Kuntz  
Number: 025952

Reinspection Date: 01/29/07

Homo Area ID: 2670 / 01 / 01 / AA	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	1929 SF	0	0	1	No	1/D

Homo Area ID: 2670 / 01 / 02 / BB	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	6957 SF	0	0	1	No	1/D

Homo Area ID: 2670 / 01 / 03 / CC	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	2704 SF	0	0	1	No	1/D

Homo Area ID: 2670 / 01 / 04 / DD	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	10374 SF	0	0	1	No	1/D

Homo Area ID: 2670 / 01 / 05 / EE	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	8951 SF	0	0	1	No	1/D

# Homogenous Area Information Report By ULCS Location Three Year Reinspection

Building Inspector: Melissa Kendzior  
Number: 032234

Management Planner: Jeffrey M. Kuntz  
Number: 025952

Reinspection Date: 01/29/07

Homo Area ID: 2670 / 01 / 0B / FF	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL DMGD	7896 SF	1	2 SF	1	No	6/C

**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 01 / AA</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]

**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 02 / BB</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]



**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 03 / CC</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]

**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 04 / DD</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]

**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 05 / EE</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]

**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

<b>School Name:</b>	<b>Constitution High School</b>	<b>ULCS #:</b>	<b>2670</b>
<b>Homogenous ID #:</b>	<b>2670 / 01 / 0B / FF</b>	<b>Date:</b>	<b>01 / 29 / 07</b>
<b>Homogenous ID Description:</b>	<b>Floor Tile VAT 12" x 12"</b>		

[illegible]

# Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit Cross Reference Table

In response to the AHERA Environmental Compliance Audit, a Cross Reference Table has been prepared for inclusion into the AHERA Management Plan. The purpose of this Cross Reference Table is to link the following documents to the AHERA Management Plan.

Cross Reference Table	
3 Year Reinspection Report follows this Cross Reference Table documentation.	
Subject Matter	Location of Required Documents
Designated Person	Pages 1 - 2
Annual Notification	Pages 3 - 5
6 Month Periodic Surveillance Outline of Events	Page 6
3 Year Reinspections Outline of Events	Page 7
Asbestos Management Program (operations and maintenance)	Pages 8 - 19
Asbestos Investigation Report (AIR) Demolition Directive Procedure	<ul style="list-style-type: none"> <li>• Attachment 1</li> <li>• Letter Dated August 4, 2006</li> </ul>
Training (included in the Asbestos Management Program)	<p>The original records are centralized at the School District's Environmental Library. Copies are maintained on staff and are required to be maintained in the latest Re-inspection Report.</p> <p>2 hour awareness training records for all Building Engineers, Custodian Assistants and maintenance personnel.</p> <p>40 hour worker/supervisor training records for the OEMS A-Team and various AST tradesmen.</p>
Response Actions (monthly mailings if applicable)	The original documents are on file at the School District's Environmental Library.
	Copies of the original are mailed to the School's Main Office for retention with the Management Plan documentation. These documents are typically kept separate from the management plan in an update binder due to the potential volume of response action reports.

**SCHOOL DISTRICT OF PHILADELPHIA  
ASBESTOS DESIGNATED PERSON**

Gerald F Junod  
Office of Capital Programs  
Environmental Management & Services  
440 N Broad Street, 3<sup>rd</sup> Floor  
Philadelphia, PA 19130  
Telephone: 215 400 6738  
Fax: 215 400 4751

Drexel University- Asbestos Building Inspector Course  
Drexel University- Asbestos Management Planner Course

January 9-11, 1989 24 Hours  
January 12-13, 1989 16 Hours

Annual Building Inspector Refreshers

1990 through 2007 4 Hours

Drexel University  
Criterion Laboratories, Inc  
Access Training Services, Inc.

Annual Building Management Planner Refreshers

1990 through 1994 4 Hours

Drexel University  
Criterion Laboratories, Inc

Manager, City of Philadelphia Asbestos Control Program

Served as the Asbestos Control Program Manager for the City of Philadelphia, Department of Public Health, Air Management Services, Asbestos Control Unit from August 1, 2003 through October 23, 2006.

Mid Atlantic Regional Environmental Consortium (MAREC)

Former member with attendance and participation commitments of all quarterly EPA Region III and yearly National Asbestos Regulatory Conferences sponsored by the EPA and the National Conference of State Legislators respectively as a representative for the City of Philadelphia Department of Public Health Air Management Services from 1994 through 2006.

Philadelphia Environmental Task Force

Former member of the Philadelphia Environmental Task force as a representative and point of contact for the City of Philadelphia Department of Public Health Air Management Services Asbestos Control Unit from 2002 through 2006.

Asbestos Instructor

Worked as the primary instructor for the initial and annual Asbestos Project Inspector training and licensing program as mandated by City of Philadelphia Department of Public Health Asbestos Control Regulations from August 1994 through October 2006.

Worked as a lead instructor with an Environmental Consulting Firm and approved by the US EPA for the initial and annual refresher training courses for various asbestos occupational disciplines such as the Building Inspector, Management Planner and Worker/Supervisor from 1991 through 1994.

I certify that the general, local agency responsibilities as stipulated in Section 763.84 will be met.

Gerald F. Junod  
Asbestos Designated Person  
Assistant Environmental Manager  
Office of Environmental Management and Services

## **SCHOOL DISTRICT OF PHILADELPHIA**

### **Accreditation Information Statement**

**All persons who inspect for Asbestos Containing Building Materials (ACBM) and who will design or carry out response actions with respect to assumed and confirmed ACBM, will be accredited by an EPA approved course and/or a State Contractors Accreditation Program under Sections 206 (c) and 206 (b) of Title II of the ACT**

**Gerald F. Junod  
Asbestos Designated Person  
Assistant Environmental Manager  
Office of Environmental Management and Services**

SCHOOL DISTRICT OF PHILADELPHIA  
OFFICE OF CAPITAL PROGRAMS  
440 NORTH BROAD STREET, SUITE 373  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES /

PHONE (215)-400-4750

September 4, 2007

TO: All Principals  
All Building Administrators  
All Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

Francine Locke, Manager  
Office of Environmental Management and Services

SUBJECT: Annual EPA Notification Letter

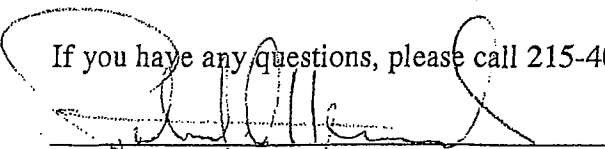
Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 C.F.R. 763.93(g)(4) of public access to environmental records, this letter is to acknowledge the availability of your facility's Asbestos Hazard Emergency Response Act (AHERA) Management Plan.

Enclosed please find a copy of the Notification Letter and a Parents' Signature form informing them of the availability of this information for review. Each member of the school staff is also required to receive a copy of the Notification Letter. At the direction of the Principal, a copy is to be posted on the bulletin boards and an appropriate amount of copies are to be generated for distribution. The signed Parent forms are to be returned to the school and retained with the existing AHERA Management Plan, Three Year Reinspection reports, etc., in a central location by the Principal.

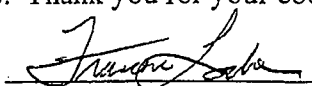
Note: The AHERA Three Year Reinspection reports, in colored binders; Red, Dark Blue, Green, Yellow and White, are Federal EPA mandated inspection documents. The School District of Philadelphia is subject to severe penalties (\$) if the reports and associated paperwork are not available to the EPA and the public upon request.

It is incumbent on designated school personnel to gather and retain this data as it is delivered, in one location for future review. Acceptable locations include the Principal's/Main Office for the primary data and the Building Engineer's Office for the secondary duplicate copies.

If you have any questions, please call 215-400-4750. Thank you for your cooperation.



Patrick A. Henwood  
Senior Vice President  
Office of Capital Programs



Francine Locke, Manager  
Office of Environmental Management  
and Services



File #204  
September 4, 2007

**OFFICIAL NOTICE**

**PLEASE POST**

TO: Principals  
Building Administrators  
Building Engineers  
Building Occupants  
Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

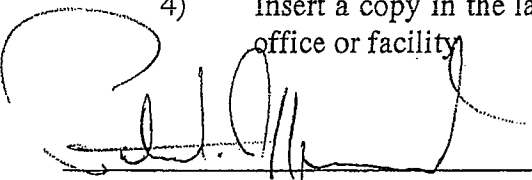

Francine Locke, Manager  
Office of Environmental Management and Services

SUBJECT: Annual Notice: Asbestos Hazard Emergency Response Act

The Federal Register published on October 30, 1987, part III, in Schools: Final Rule and Notice, 763.84 states that each local education agency shall ensure that workers and building occupants or guardians are to be informed at least once each school year about inspections, response actions and post-response action activities including periodic re-inspections and surveillance activities. The School District as the local education agency retains such reports that are available for public inspection in the Office of the Principal or Building Administrator.

The Principal or Building Administrator is required to do the following with this notification:


- 1) Post in a Public Place
- 2) Inform Building Occupants
- 3) A copy of the notification sent to Parents/Guardians (along with the Notification Form to be returned to school)
- 4) Insert a copy in the latest AHERA Three Year Reinspection report (red binder) in your office or facility

  
Patrick A. Henwood, Senior Vice President  
Office of Capital Programs  
Francine Locke, Manager  
Office of Environmental Management  
and Services

SCHOOL DISTRICT OF PHILADELPHIA

Annual EPA Notification Form

September 4, 2007

TO: All Parents or Guardians  
FROM: Francine Locke, Manager   
Environmental Management and Services

This form is to acknowledge receipt of the Annual EPA Notification Letter regarding the availability of the Asbestos Hazard Emergency Response Act (AHERA) Management Plan and Three Year Reinspection reports for review.

This form shall be signed and returned to school for filing with the AHERA Management Plan, etc., by the designated school staff.

Thank you for your timely response.

Students Name (PRINT) \_\_\_\_\_

School (PRINT) \_\_\_\_\_

Grade Level (PRINT) \_\_\_\_\_

Parent/Guardian (PRINT) \_\_\_\_\_

Parent/Guardian Signature \_\_\_\_\_

SCHOOL DISTRICT OF PHILADELPHIA  
Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

AHERA  
Six Month Surveillance  
Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.92(b), the following procedure is to be implemented. At least once every six (6) months after a management plan is in effect, each Local Education Agency (LEA) shall conduct a periodic surveillance in each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.
- The first bi-annual inspection starts in the Spring (March, April, May) and again in the Fall (October, November, December) of each year. The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.
- The Building Inspector shall visually inspect all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials.
- The Building Inspector shall make a copy of the inspection document and insert into the front of the latest Management Plan (AHERA Three Year Reinspection report). The original document is returned to the LEA's environmental library and filed.

# SCHOOL DISTRICT OF PHILADELPHIA

Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

## AHERA Three Year Reinspection Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.85(b) the following procedure is to be implemented. At least once every three (3) years after a management plan is in effect, each Local Education Agency (LEA) shall conduct a reinspection of each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.
- Subsequent three year reinspections (2009, 2012, 2015, etc) shall start in the Fall (October, November, December, January). The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspace/Attics) and rooms in the facility. There is no action required of the Principal.
- An accredited Building Inspector shall visually inspect and touch to determine friability, all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials. The inspectors state of accreditation and license number is required.
- The Building Inspector shall return the reinspection data to the Management Planner to be assessed and determine appropriate response actions and a report issued (AHERA Three Year Reinspection report). One copy of the report is delivered to the schools principal to be permanently retained with all previous environmental data. Another copy is retained in the LEA's environmental library.



**School District of Philadelphia**  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

## **School District of Philadelphia Asbestos Management Program**

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## DEFINITIONS/ACRONYMS

<b>ACM/PACM</b>	<b>Asbestos Containing Material /Potential Asbestos Containing Material</b>
<b>AHERA</b>	<b>Asbestos Hazard Emergency Response Act</b>
<b>AIR FORM</b>	<b>Asbestos Inspection Report Form</b>
<b>Amended Water</b>	<b>Water to which a surfactant (soap) has been added.</b>
<b>AMP</b>	<b>Asbestos Management Program/Asbestos Management Plan</b>
<b>Asbestos Designated Person</b>	<b>Individual assigned by the district to oversee asbestos related issues</b>
<b>Asbestos Regulated Area</b>	<b>Location that is posted as an asbestos work area in which only approved and accredited personnel are permitted to enter.</b>
<b>AST</b>	<b>Asbestos Support Team involving approved and accredited school district tradespersons personnel that are school district person</b>
<b>A-TEAM</b>	<b>School District of Philadelphia asbestos workers</b>
<b>CIP</b>	<b>Capital Improvement Program</b>
<b>Consultant</b>	<b>Asbestos consulting firm hired by the District</b>
<b>Demolition Directive</b>	<b>Memorandum - August 4, 2006 from Patrick Henwood</b>
<b>EPA</b>	<b>Environmental Protection Agency</b>
<b>In House Personnel</b>	<b>School District of Philadelphia asbestos workers</b>
<b>LEA</b>	<b>Local Education Agency</b>
<b>O&amp;M</b>	<b>Operations and Maintenance</b>
<b>OEMS</b>	<b>Office of Environmental Management and Services</b>
<b>OSHA</b>	<b>Occupational Safety and Health Administration</b>
<b>PEL</b>	<b>Permissible Exposure Limit</b>
<b>PSD or SDP</b>	<b>Philadelphia School District/School District of Philadelphia</b>
<b>PSIT</b>	<b>Philadelphia School Improvement Team</b>
<b>STEL</b>	<b>Short Term Excursion Limit</b>

## **1. Introduction**

### **The School District of Philadelphia, Asbestos Policy Statement:**

The School District of Philadelphia is dedicated to providing a safe and healthful work environment for its employees, students, faculty, contractors and visitors. In recognition of the potential health problems associated with asbestos, the School District of Philadelphia is committed to a comprehensive asbestos control program. This program is implemented and maintained through the School District of Philadelphia's Office of Environmental Management and Services (OEMS).

OEMS has the responsibility of establishing procedures for asbestos abatement, asbestos inspection, air monitoring, renovation and demolition activities within all School District of Philadelphia owned or leased facilities.

These procedures are developed to ensure that:

- (1) People are not exposed to significant levels of asbestos fibers;
- (2) Asbestos waste is handled and disposed of properly;
- (3) Members of the School District of Philadelphia community have access to the Office of Environmental Management and Services for information, assistance, guidance, and interpretation regarding asbestos related matters;
- (4) Members of the School District of Philadelphia community have access to the Asbestos Management Plans as required and outlined in the US EPA AHERA regulations including annual written notification to all parents;
- (5) Compliance with all applicable Federal, State and Local Asbestos Regulations.

Requirements outlined in this manual are mandatory in nature where the word "SHALL" is used and are advisory in nature where the word "SHOULD" is used.

## **2) Summary of Asbestos Management Program**

The School District of Philadelphia's Asbestos Management Program was established to meet the requirements of Federal, State and Local Regulations.

These regulations include, but are not limited to:

- US Environmental Protection Agency Asbestos Hazard Emergency Response Act (US EPA AHERA) and National Emissions Standard for Hazardous Air Pollutants subpart M, Part 61 (NESHAP);
- US Department of Labor, Occupational Safety and Health Administration (OSHA) General Industry Standard (29 CFR 1910.1001) and the OSHA Asbestos Standard for the Construction Industry (29 CFR 1926.1101);
- The Commonwealth of Pennsylvania, Department of Labor and Industry, Asbestos Occupations, Accreditation and Certification Act;
- The City of Philadelphia, Department of Public Health, Asbestos Control Regulations.



### **3) Asbestos Management Program Execution**

#### **a) General Execution**

The Office of Environmental Management and Services(OEMS) develops, implements and manages safety and health programs for the School District of Philadelphia faculty, staff and students and assists with ensuring that all contractors comply with Federal, State and Local Environmental Regulations. The OEMS provides the oversight of School District of Philadelphia employees (Asbestos A-Team), environmental consultants, and asbestos abatement contractors for all projects within the School District of Philadelphia concerning Asbestos Containing Materials.

The control of safety and health hazards at the School District of Philadelphia is primarily through the implementation of engineering, work practice and administrative controls. Personal Protective Equipment (PPE) is used to supplement these controls or whenever the controls are not feasible or are in the process of being implemented. PPE is also recommended whenever exposures to chemical, physical or biological agents can be prevented or reduced by its use.

This written program establishes the procedures necessary to:

- 1) meet established standards and federal regulations for occupational exposure to asbestos fibers;
- 2) meet the requirements of the City of Philadelphia Asbestos Control Regulations which encompasses the disturbance and/or abatement of asbestos containing building materials;
- 3) provide the necessary health and safety protection to School District of Philadelphia staff, faculty, students, contractors and visitors.

This program is strengthened by input and cooperation with the Philadelphia Federation of Teachers (PFT), Health & Welfare Fund.

### **4) Summary of Program Execution**

#### **a) Asbestos Management Program Execution**

The Asbestos Management Program is administered by the Office of Environmental Management and Services (OEMS). OEMS provides the following services primarily through professional consultants:

- (1) exposure monitoring services;
- (2) building inspection/surveys (bulk sampling) for the identification of asbestos containing materials;
- (3) asbestos project design services;
- (4) asbestos abatement project and air monitoring services;
- (5) emergency response to fiber release episodes;
- (6) education/information;
- (7) medical monitoring;
- (8) training for School District of Philadelphia personnel

### **5) Responsibilities**

#### **a) Office of Environmental Management and Services**

OEMS is responsible for performing the following functions:

- (1) Developing and administering of the Asbestos Management Program.
- (2) Providing asbestos-related services to all School District of Philadelphia departments.
- (3) Conducting required training of the Asbestos Management Program and working jointly with departments to schedule training.
- (4) Identifying and posting areas where labeling/signage is required.

- (5) Medical Monitoring of OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
- (6) Certification and training as required for OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
- (7) Record keeping as outlined in Section 3.5 and all records as by required by US EPA AHERA regulations.

**b) Asbestos Worker/ Supervisor-"A-TEAM"**

- (1) OEMS shall ensure that all "A-TEAM" workers/supervisors adhere to the following requirements:
  - (a) Attend an initial Worker/Supervisor Asbestos Course;
  - (b) Maintain the annual re-certification per EPA AHERA requirements and Commonwealth of Pennsylvania Asbestos Occupations, Accreditation and Certifications Act;
  - (c) Undergo an annual Asbestos Medical Evaluation;
  - (d) Undergo an annual Respirator Medical Clearance;
  - (e) Undergo an annual Respirator Fit Testing.

**c) Asbestos Designated Person**

The Asbestos Designated Person is responsible for:

- (1) Assuring the health and safety of employees, students and visitors in the School District of Philadelphia facilities under his/her control.
- (2) Being kept informed of all areas under his or her jurisdiction where potential asbestos exposures exist and initiating protection programs that adhere to the Asbestos Management Program requirements of this manual.
- (3) Assuring that Asbestos Management Program requirements are adhered to by principal investigators, project managers, supervisors, or division heads, and School District of Philadelphia personnel under their supervision.
- (4) Ensuring that all employees within the Asbestos Management Program comply with (OSHA 1910.1001 (j) (7) (iv)) and the US EPA AHERA regulations by attending the required training.
- (5) Ensure the posting of:
  - (a) warning labels/signage
  - (b) Commonwealth of Pennsylvania Asbestos Abatement and Demolition/ Renovation Notification form
  - (c) Asbestos Inspection Reports (AIR) form (where required)
  - (d) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

**d) Supervisor or Project Manager (Capital, Maintenance and Facilities)**

Each person in charge of a project, maintenance/repair, renovation/demolition, or other activity from the Departments of Capital, Maintenance, and/or Facilities, where asbestos containing materials may be present is responsible for:

Identifying, with the assistance of OEMS, asbestos containing building materials prior to any disturbance of these materials. Various Federal (EPA and OSHA) and Local (City of Philadelphia Asbestos Control Regulations) require Asbestos Inspections prior to renovation/demolition activities. This shall be accomplished by always following the Asbestos Management Program Procedures as follows:

- (1) Ensure that the requirements of the Asbestos Management Program Procedures are followed by all personnel, trades, and contractors who are involved with the project;

- (2) Review of the required Asbestos Inspections Report (AIR) form (Attachment 1) and AHERA Management Plan documents prior to activities that may disturb any Asbestos Containing Materials;
- (3) Perform all project related duties as outlined in the Project Manager Responsibilities;
- (4) Keep the department chairperson or director informed of any actions proposed or taken regarding the Asbestos Management Program.
- (5) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

**c) Employee – Capital**

School District of Philadelphia Capital employees and/or consultants shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of the projects they are performing or managing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit (a.k.a PSIT Service Request Form) and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

The types of projects represented as part of the Capital Improvement Program are as follows:

- (1) Complete Renovation of an existing building that addresses all facility component concerns and educational program needs;
- (2) Major Renovation of an existing building addressing significant facility component and educational improvements;
- (3) Addition to an existing building (either as an attachment or stand-alone structure) to accommodate needed program space;
- (4) Conversion of an existing facility to accommodate a change in educational program;
- (5) Facility Component Improvement of specific facility needs (i.e. electrical or HVAC system upgrades, ADA improvements, life safety improvements, exterior renovations, etc.).

**d) Employee - Maintenance**

School District of Philadelphia Maintenance employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in maintenance activities shall attend required Asbestos Awareness training program within 60 days of employment

**e) Employee – Facilities & Custodial**

School District of Philadelphia Facilities and Custodial employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed;
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in Facilities and Custodial activities shall attend required Asbestos Awareness training program within 60 days of employment.

## 2) Requirements

### a) Employee Exposure Monitoring

When information indicates that an employee's exposure to asbestos fibers may equal or exceed an 8-hour time-weighted average of 0.1 f/cc \* (per OSHA 1910.1001 & 1926.1101), OEMS shall develop and implement an asbestos exposure monitoring program. The sampling strategy shall be designed to identify employees by work task (job classification) that is exposed to asbestos fibers that exceed an 8-hour time-weighted average of 0.1 f/cc.

### b) Employee Notification

OEMS shall notify in writing, each employee exposed to asbestos fibers at or above an 8-hour time weighted average of 0.1 f/cc.

### c) Observation of Monitoring

OEMS shall provide employees or their representatives with an opportunity to observe any exposure measurements conducted.

### d) Training Program

OEMS shall institute a training program which meets the requirements of AHERA for all employees who perform maintenance operations in a facility/school which contains asbestos containing materials or presumed asbestos containing materials and 1910.1001 (j), and the Commonwealth of Pennsylvania Department of Labor and Industry and the City of Philadelphia Asbestos Control Regulations. The affected departments shall ensure employee participation in this program. The OEMS "A-TEAM" and other departments "AST" Asbestos Program staff training shall be conducted annually for each employee as required by all Federal, State and Local for each asbestos discipline.

All Asbestos Awareness training as required by AHERA shall be performed within 60 days of employment and shall include:

- o health effects of asbestos
- o locations of ACM and PACM in the building/facility
- o recognition of ACM and PACM damage and deterioration
- o requirements of the OSHA 1910.1001 standard relating to maintenance
- o proper response to fiber release episodes
- o procedure to be followed to isolate areas affected by fiber releases

### e) Access to Information

OEMS shall make available to affected employees or their representative's copies of the Occupational Safety and Health Administration (OSHA) General Industry Standard Part 1910.1001 and the department shall post a copy in the workplace.

### f) Record keeping

OEMS shall maintain an accurate record of all employee exposure measurements. OEMS and/or the School District of Philadelphia Human Resources Department shall maintain records of employee medical monitoring program. OEMS shall maintain all employee training records. All records shall be provided upon request to employees, former employees, representatives designated by the individual employee.



## **7) AHERA OPERATIONS AND MAINTENANCE PLAN**

### **a) CONTROLS**

#### **i) Work Order System**

Minimizing disruption of ACM/PACM during maintenance and renovation activities is the primary goal and task encountered by OEMS. Operations and maintenance employees and contractors should be warned to avoid conducting any maintenance work which may disturb ACM/PACM. Initiating a work order system, where all work orders or requests are channeled through the Office of Environmental Management and Services (OEMS), will be the method used to control and minimize disruption of ACM/PACM.

Any work performed by in-house personnel or contractors that could or will impact ACM/PACM shall be coordinated by OEMS. A completed Asbestos Inspection Report Form (Attachment 1) shall be issued to in-house personnel and/or all contractors whose work could impact ACM/PACM. This form should accompany each contract issued to an outside contractor and posted on the jobsite.

All work order requests for maintenance and renovation activities in areas where ACM/PACM is suspected or known to be present are to be submitted to OEMS prior to proceeding with work. OEMS is responsible for reviewing asbestos survey records for information about the presence of ACM/PACM in the area where the work is to be performed. OEMS should physically inspect the area to ensure existing records reflect actual conditions. If no asbestos is present, a work order is not necessary and the planned actions can proceed. If ACM/PACM is found to be present in the area, OEMS will sign the work order application and obtain an approved and accredited asbestos contractor or assign OEMS "A-TEAM" to abate the ACM/PACM.

#### **ii) Regulated Areas**

The owner will identify and regulate all areas where airborne concentrations of ACM/PACM exceed the Permissible Exposure Limit (PEL)\* (Per OSHA determined to be 0.1 f/cc) and/or short-term exposure limit (STEL) (Per OSHA determined to be 1.0 f/cc), or there is reasonable possibility that the (PEL) and/or (STEL) may be exceeded. All ACM/PACM removal activities involving thermal system insulation ACM/PACM (Class I), surfacing ACM/PACM (Class I), and miscellaneous ACM/PACM such as floor tile, roofing, and siding mastic, etc. (Class II), and repair and maintenance operations where thermal system insulation and surfacing ACM/PACM is likely to be disturbed (Class III) will be performed in accordance with federal, state, and local regulations. All asbestos abatement work and activities will be designated and managed as asbestos regulated areas. These areas will be demarcated and labeled.

#### **iii) Warning Signs**

Warning signs shall be displayed at all approaches to each asbestos regulated area. The asbestos abatement contractor will provide OSHA warning signs in all regulated areas during removal, repair, and other maintenance activities. OEMS will provide AIRs to all contractors who must inform all employees and supervisors working in locations contiguous to asbestos regulated areas of the potential hazards and work practices required.

#### **iv) Warning Labels**

Warning labels and/or signage shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers. Generally, the asbestos abatement contractor or OEMS A-Team personnel will provide all warning labels for ACM/PACM containment.

## **8) O & M RESPONSE ACTIONS**

The Asbestos Management Program general O&M procedures are outlined in this section. Additional requirements specific to asbestos abatement activities are included the Project Design documents for all Asbestos Abatement Work. Regular cleaning, inspection, and reporting of ACM/PACM deterioration or other problems must be diligently practiced by all employees including custodial and maintenance personnel.

### **a) Facility Maintenance Isolation of Area Responsibilities**

Maintenance personnel are often required to work in areas where ACM/PACM may potentially be disturbed. Most maintenance activities are conducted by in-house staff, outside contractors, or a combination.

Emergency fiber release episodes, such as pipe fitting or valve breaks, emergency boiler work, or mechanical equipment repair will be responded to by OEMS A-Team personnel or asbestos abatement contractor personnel. The owner's maintenance staff will: (1) isolate the emergency fiber release area; (2) post warning signs to prevent unauthorized access, and (3) notify their supervisor and OEMS. OEMS will ensure that the fiber release area remains isolated and is properly cleaned by an approved and accredited abatement contractor or by OEMS A-TEAM personnel.

### **b) Unlikely Contact with ACM/PACM**

Maintenance activities or repairs which can be performed without contacting or disturbing the ACM/PACM require little more than normal care and good workmanship. For example, valves which are either uncovered or covered with non-asbestos insulation can be packed or repaired without disturbing asbestos insulation on nearby pipes. The major precaution is to ensure that maintenance and custodial personnel are familiar with procedures such as isolating the area, posting warning signs, and notifying OEMS in the event of any accidental ACM/PACM disturbance.

### **c) Accidental Disturbance of ACM/PACM**

Maintenance & facilities personnel shall notify OEMS any time a fiber release is suspected. If friable ACM/PACM becomes airborne in the building,

### **d) Planned Disturbance of ACM/PACM**

Maintenance activities that may impact ACM/PACM include access to a valve, flange, duct, or related system component.

Where asbestos-containing insulation must be removed to maintain or repair the thermal system, the ACM/PACM will imminently be disturbed. ACM/PACM removal work shall be conducted by OEMS A Team personnel or an approved and accredited asbestos abatement contractor.

If friable ACM/PACM becomes airborne in the building, maintenance and facilities personnel shall secure the area and contact OEMS. OEMS shall respond accordingly.

**e) Miscellaneous ACM/PACM**

Miscellaneous types of ACM/PACM may include vinyl asbestos floor tiles, mastics/adhesives and woven vibration dampers. Disturbance of these materials should be avoided. Routine maintenance activities involving these materials should not pose a problem if handled properly. Questions on the proper removal and disposal of miscellaneous ACM/PACM should be directed to OEMS. OEMS will contact an approved and accredited asbestos abatement contractor or utilize OEMS A-TEAM personnel to assist with miscellaneous ACM/PACM clean-up activities.

**f) Vinyl Asbestos Floor Tile**

Asbestos-containing floor tiles in good condition are considered non-friable unless they are crushed, drilled, sawed, sanded or disturbed by any activity that breaks up the material. Routine maintenance of these materials should employ the use of non-abrasive buffers and wet cleaning techniques. Broken or loose floor tiles should be removed and disposed of as asbestos waste by OEMS. Remaining debris should be vacuumed with a HEPA vacuum and the area wet mopped using amended water.

**g) Mastics/Adhesives**

Mastics and adhesives containing asbestos in good condition are considered non-friable and do not pose a potential health concern unless crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**h) Woven Vibration Dampers**

Woven vibration dampers in good condition are considered non-friable and do not pose a potential health concern unless cut, crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**i) Other Work Practices**

Any special work not included in this section should be addressed directly to OEMS for review prior to the initiation of work that may involve the disturbance of ACM/PACM.

**j) Fiber Release Episodes**

Facilities and maintenance staff should report to OEMS the presence of asbestos debris, water or physical damage to ACM/PACM, or any other evidence of possible fiber release. OEMS should have the OEMS A-Team personnel or an approved and accredited abatement contractor respond to the site to clean up debris and make repairs as soon as possible. OEMS will also contact a consultant to conduct air monitoring and prepare a report and submit at project completion to OEMS for each episode. OEMS will forward the reports for each site location AHERA Management Plan accordingly.



## 9) REFERENCES and RESOURCES

Applicable regulations for asbestos projects impacted by renovation, demolition, and maintenance activities.

- **Philadelphia Air Management Services - Asbestos Control Unit**  
<http://www.phila.gov/health/units/ams/Asbestos/asbestos.html>
- **Pennsylvania Asbestos Occupations, Accreditation and Certification Act**  
<http://www.dli.state.pa.us/landi/cwp/view.asp?a=185&q=56262&landiNav=>
- **United States Environmental Protection Agency Asbestos Home Page**  
<http://www.epa.gov/asbestos/>
- **Occupational Health and Safety Administration (OSHA) Asbestos Home Page**  
<http://www.osha.gov/SLTC/asbestos/>



City of Philadelphia - Department of Public Health  
Public Health Services - Air Management Services  
Asbestos Control Unit - 321 University Av., 19104

Office Use Only

Date Received L&I:

Date Received AMS:

Date Inspected:

Inspector #

## Asbestos Inspection Report

### School District of Philadelphia projects ONLY

1. Name of Building:

Phone #

2. Name of Building Owner: School District of Philadelphia

Phone # 215-400-4750

440 North Broad Street, Philadelphia, PA 19130

3. Name of Licensed Investigator:

License #

Phone #

4. Name of Certified Lab:

License #

Phone #

5. Scope of Work: (include all locations)

Asbestos Containing Material Present? ☐ Yes (List Below) ☐ No

6. List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. Yes (Investigator) must label all ACM that may be left in the work area. Page 1 of \_\_

Location	Description	Type (Code 1)	Amount		Condition (Code 2)	Action (Code 3)
			Square	Linear		

Code 1

FRI - Friable

NF1 - Non-Friable, Cat. 1

NF2 - Non-Friable, Cat. 2

Code 2

DD - Deteriorated or

Delaminated

ND - Non-Damaged

Code 3

REM - Removal necessary prior to Demo/Reno

NRN - No removal necessary, label ACM

REP - Repair & Label ACM, removal not necessary

I hereby certify that the foregoing statements are true and the information contained in this report is true. This certification is made subject to the penalties set forth in 18 PA. C.S. S4904 relating to unsworn falsification to authorities. Furthermore I certify that the inspection, sampling, and labeling requirements of section X of the Asbestos Control Regulation (ACR) have been met. The building owner has been notified of the ACR requirements and given a copy of this report. If the inspection has revealed ACM which will be disturbed by the proposed work or if it has revealed ACM in bad condition, the building owner has been notified to remove or repair the ACM in accordance with the ACR prior to renovation or demolition activity.

Signature of Licensed Asbestos Investigator:

Date:

Signature of Building Owner:

Date:



Page 2 of \_\_\_\_\_ Project Name: \_\_\_\_\_ Project No. \_\_\_\_\_

6. *continued*

List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area.

Location	Description	Type (Code 1)	Amount		Condition (Code 2)	Action (Code 3)
			Square Ft.	Linear Ft.		

7. List all locations inspected that do **NOT** have asbestos containing material present:

Location	Location	Location	Location

8. List all homogeneous materials present in this school:

ASBESTOS CONTAINING MATERIALS	NON-ASBESTOS MATERIALS

9. Caution labels affixed to all ACM? ☐ Yes ☐ No

*All contractors' employees involved in the demolition or renovation activity must receive a copy or have access to this Asbestos Inspection Report.*

Signature \_\_\_\_\_ Date \_\_\_\_\_

**THE SCHOOL DISTRICT OF PHILADELPHIA**

**OFFICE OF CAPITAL PROGRAMS**

340 NORTH BROAD STREET, 3RD FLOOR  
PHILADELPHIA, PENNSYLVANIA 19130-4015

TELEPHONE (215) 400-4730

FAX (215) 400-4731

August 4, 2006

TO: All Project Management Personnel

FROM: Patrick Henwood, Director  
Office of Capital Programs

SUBJECT: Construction Projects

Effective immediately, if it is necessary to demolish or open a wall, ceiling or floor as part of a construction project, it is now required that a special assessment be made by the PSIT environmental consultant, prior to commencement. The purpose of this new control is to prevent construction workers from unknowingly being exposed to asbestos containing materials.

The procedure will be as follows: the Construction Manager (CM) will provide the Project Manager (PM) with a two week look-ahead indicating exact locations of surfaces that will need to be demolished or altered. If possible, the CM will clearly mark/label the affected surfaces and/or items. The PM will then notify the Environmental Department who will send a City of Philadelphia licensed investigator to inspect and test the areas. The work may not proceed unless and until the investigator provides a report that clears the area.

Additionally, please ensure that, for all projects, a copy of the latest AHERA report, the appropriate Asbestos Inspection Report and all MSDS are available and posted in conspicuous locations. If environmental concerns are expressed to the CM by construction workers and can not be resolved, please have the CM contact you and the Environmental Department at (215) 400-4750 as soon as possible.

Thank you for your cooperation in this matter.

C. Fred Farlino  
Len Dillinger, PE  
Joel Jackson  
Joe Joseph  
Francine Locke  
Gene Becker  
Vince Pagliaro

SCHOOL DISTRICT OF PHILADELPHIA  
OFFICE OF CAPITAL PROGRAMS  
440 NORTH BROAD STREET, SUITE 373  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES

PHONE (215)-400-4750

September 4, 2007

TO: All Principals  
All Building Administrators/Occupants  
All Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

Mgr Francine Locke, Director  
Office of Environmental Management and Services

SUBJECT: Annual EPA Notification Letter


Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 C.F.R. 763.93(g)(4) of public access to environmental records, this letter is to acknowledge the availability of your facility's Asbestos Hazard Emergency Response Act (AHERA) Management Plan.

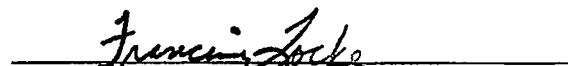
Enclosed please find a copy of the Notification Letter and a Parents' Signature form informing them of the availability of this information for review. Each member of the school staff, temporary workers and/or contractors, are also required to receive a copy of the Notification Letter. At the direction of the Principal, a copy is to be posted on the bulletin boards and an appropriate amount of copies are to be generated for distribution. The signed Parent forms are to be returned to the school and retained with the existing AHERA Management Plan, Three Year Reinspection reports, etc., in a central location by the Principal.

Note: The AHERA Three Year Reinspection reports, in colored binders; Red, Dark Blue, Green, Yellow and White, are Federal EPA mandated inspection documents. The School District of Philadelphia is subject to severe penalties (\$) if the reports and associated paperwork are not available to the EPA and the public upon request.

It is incumbent on designated school personnel to gather and retain this data as it is delivered, in one location for future review. Acceptable locations include the Principal's/Main Office for the primary data and the Building Engineer's Office for the secondary duplicate copies.

If you have any questions, please call 215-400-4750. Thank you for your cooperation.

  
Patrick A. Henwood  
Senior Vice President  
Office of Capital Programs

  
Francine Locke, Director  
Office of Environmental Management  
and Services



**School District of Philadelphia**  
**OFFICIAL NOTICE**

**PLEASE POST**

File #204  
September 4, 2007

**TO:** Principals  
Building Administrators  
Building Engineers  
Building Occupants  
Parents/Guardians

**FROM:** Patrick A. Henwood, Senior Vice President  
Office of Capital Programs


Francine Locke, Director  
Office of Environmental Management and Services


**SUBJECT:** Annual Notice: Asbestos Hazard Emergency Response Act

The Federal Register published on October 30, 1987, part III, in Schools: Final Rule and Notice, 763.84 states that each local education agency shall ensure that workers and building occupants or guardians are to be informed at least once each school year about inspections, response actions and post-response action activities including periodic re-inspections and surveillance activities. The School District as the local education agency retains such reports that are available for public inspection in the Office of the Principal or Building Administrator.

The Principal or Building Administrator is required to do the following with this notification:

- 1) Post in a Public Place
- 2) Inform Building Occupants
- 3) A copy of the notification sent to Parents/Guardians (along with the Notification Form to be returned to school)
- 4) Insert a copy in the latest AHERA Three Year Reinspection report (red binder) in your office or facility.

  
Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

  
Francine Locke, Director  
Office of Environmental Management  
and Services

SCHOOL DISTRICT OF PHILADELPHIA

Annual EPA Notification Form

September 4, 2007

TO: All Parents or Guardians

FROM: Francine Locke, Director  
Environmental Management and Services



This form is to acknowledge receipt of the Annual EPA Notification Letter regarding the availability of the Asbestos Hazard Emergency Response Act (AHERA) Management Plan and Three Year Reinspection reports for review.

This form shall be signed and returned to school for filing with the AHERA Management Plan, etc.,  
by the designated school staff.

Thank you for your timely response.

Students Name (PRINT) \_\_\_\_\_

School (PRINT) \_\_\_\_\_

Grade Level (PRINT) \_\_\_\_\_

Parent/Guardian (PRINT) \_\_\_\_\_

Parent/Guardian Signature \_\_\_\_\_